

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

BRIAN BEMKE, SCOTT COLLETT,
JOHN FERIOZZI, JUDY FINTZ, SARAH
JAMIESON, EVAN JOHNSON, TRACY
LONG, and CLIFFORD NEUMANN,

Plaintiffs,

v.

Case No. 21-CV-560

AMY PECHACEK, in her official
capacity as Secretary-designee of the
State of Wisconsin Department of
Workforce Development,

Defendant.

STIPULATION AS TO NUMEROSITY OF PUTATIVE CLASS

Plaintiffs and Defendant, by their undersigned counsel, hereby stipulate and agree as follows.

The following putative class is so numerous that joinder of all members would be impracticable: All individuals who applied for and were ineligible to receive unemployment insurance (UI) benefits in Wisconsin because they were receiving Social Security Disability Insurance (SSDI) benefits or who applied for and received UI benefits in Wisconsin but were ordered to repay those benefits, with or without penalties, because they were ineligible to receive UI benefits because of their receipt of SSDI benefits.

<p>Dated this 22nd day of November 2024.</p> <p>Electronically signed by:</p> <p><u>s/Paul A. Kinne</u> Paul A. Kinne (SBN: 1021493) Riley C. Leonard (SBN: 1101452) GINGRAS, THOMSEN & WACHS, LLP 8150 Excelsior Drive Madison, WI 53717 Tel: (608) 833-2632 Kinne@gtwlawyers.com rleonard@gtwlawyers.com</p> <p><u>s/ Victor Forberger</u> Victor Forberger (SBN: 1070634) VICTOR FORBERGER, ESQ. 2509 Van Hise Ave Madison, WI 53705 Tel: (608) 352-0138 Forberger@fastmail.fm</p> <p><u>s/Heath Straka</u> AXLEY BRYNELSON, LLP Heath Straka (SBN: 1031351) 2 E. Mifflin Street, Ste. 200 Madison, WI 53701 Tel: (608) 283-6755 HStraka@axley.com</p> <p>Attorneys for Plaintiffs</p>	<p>Dated this 22nd day of November 2024.</p> <p>Electronically signed by:</p> <p><u>s/ Steven C. Kilpatrick</u> STEVEN C. KILPATRICK Assistant Attorney General State Bar #1025452</p> <p>CLAYTON P. KAWSKI Assistant Attorney General State Bar #1066228</p> <p>KARLA Z. KECKHAVER Assistant Attorney General State Bar #1028242</p> <p>Wisconsin Department of Justice Post Office Box 7857 Madison, Wisconsin 53707-7857 (608) 266-1792 (Kilpatrick) (608) 266-8549 (Kawski) (608) 264-6365 (Keckhaver) (608) 294-2907 (Fax) kilpatricksc@doj.state.wi.us kawskicp@doj.state.wi.us keckhaverkz@doj.state.wi.us</p> <p>Attorneys for Defendant</p>
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